

IN THE

E. ROBERT SEAVER, CLERK

Supreme Court of the United States

OCTOBER TERM, 1970

No. ~~430~~

70-4

SALLY M. REED;

Appellant,

—v.—

CECIL R. REED, Administrator, In the Matter of the
Estate of Richard Lynn Reed, Deceased.

JOINT SUPPLEMENTAL BRIEF

MELVIN L. WULF
American Civil Liberties
Union Foundation
156 Fifth Avenue
New York, N.Y. 10010

ALLEN R. DERR
817 W. Franklin Street
Boise, Idaho 83701

Attorneys for Appellant

CHARLES S. STOUT
Idaho Building
Boise, Idaho 83702

MYRON E. ANDERSON
Idaho Building
Boise, Idaho 83702

Attorneys for Appellee

IN THE
Supreme Court of the United States

OCTOBER TERM, 1970

No. 430

SALLY M. REED,

Appellant,

—v.—

CECIL R. REED, Administrator, In the Matter of the
Estate of Richard Lynn Reed, Deceased.

JOINT SUPPLEMENTAL BRIEF

By order dated October 12, 1970, the Court requested counsel to file supplemental briefs "on the question of the residence of each of the litigants at the time of the instigation of this litigation."

As set out in the stipulation in the Appendix, *infra*,¹ there is no issue as to residency. Both parties were residents of Idaho at the time the litigation was begun, and both parties continue to be residents of Idaho.

¹ The original copy of the stipulation has been filed with the Clerk of the Court.

Respectfully submitted,

MELVIN L. WULF

American Civil Liberties
Union Foundation
156 Fifth Avenue
New York, N.Y. 10010

ALLEN R. DERR

817 W. Franklin Street
Boise, Idaho 83701

Attorneys for Appellant

CHARLES S. STOUT

Idaho Building
Boise, Idaho 83702

MYRON E. ANDERSON

Idaho Building
Boise, Idaho 83702

Attorneys for Appellee

November 1970